

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of:

Advanced Methods to Target and Eliminate  
Unlawful Robocalls

CG Docket No. 17-59

**COMMENTS OF TELCORDIA TECHNOLOGIES, INC. D/B/A ICONECTIV**

Telcordia Technologies, Inc.<sup>1</sup>, doing business as iconectiv (“Telcordia” or “iconectiv”), is pleased to submit these comments responding to questions raised by the Federal Communications Commission (“FCC” or “Commission”) in its Second Notice of Proposed Rulemaking (NPRM) on ways to address the problem of unwanted calls to reassigned numbers. iconectiv appreciates the opportunity to comment and we do so with respect to technical and operational considerations.

iconectiv has been an authoritative partner of the communications industry for more than thirty years. A U.S. based company, iconectiv has been a major architect of the United States’ telecommunications system since it was formed at the divestiture of AT&T. We have first-hand

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<sup>1</sup>

A US-based company, Telcordia Technologies, does business as iconectiv. For more information, visit [www.iconectiv.com](http://www.iconectiv.com).

knowledge of the intricacies and complexities of creating, operating and securing the country's telecommunications infrastructure. Our core competencies include highly scalable industry database management, numbering, interconnection and routing services, third-party authentication, and network fraud prevention for the telecommunications industry.

## DISCUSSION

iconectiv has been a longstanding and active participant in the subject matter of this proceeding. On July 3, 2017, we submitted Comments on this proceeding's original Notice of Proposed Rule Making / Notice of Inquiry focusing on blocking illegal robocalls. In addition, on August 28, 2018, we submitted Comments in this proceeding's Notice of Inquiry (NOI) on the mechanisms of a reassigned number database.

**Type of Information Needed By Callers (§ 11-31)** - The Commission *seeks comment on the information a legitimate caller would have on hand when seeking to search or query a reassigned numbers database, expressing the expectation that such a caller would possess, at a minimum, the following information: (1) the name of the consumer the caller wants to reach; (2) a telephone number associated with that consumer; and (3) a date on which the caller could be confident that the consumer was still associated with that number (e.g., the last date the caller made contact with the consumer at that number; the date the consumer last provided that number to the caller; or the date the caller obtained consent to call the consumer).* iconectiv agrees with the Commission and believes it is reasonable to expect that callers would typically have a customer name, the TN associated with the customer, and either the last known good contact date of the customer or the date that consent was obtained from the customer.

The NPRM further asks if callers need any additional information beyond an indication of whether a particular number has been reassigned since a particular date. iconectiv advises that the database should be able to indicate that a telephone number (TN) has been reassigned/disconnected after a commercial caller provided date. Beyond a binary Yes/No status indication, the Commission may want to consider additional information returned in the event the answer to the query is not known, such as a reason code that could indicate the TN was not found in the database.

iconectiv believes the Commission should carefully consider whether the query service should return the customer name or the reassignment/disconnect date as the customer name could be considered Personally Identifiable Information (PII) while the reassignment/disconnect date could be considered proprietary and/or sensitive carrier information. Exposing this information as part of the database response could invite the opportunity for abuse and/or make the database a target for data mining.

The NPRM also proposes to provide callers with information about when NANP numbers are disconnected. iconectiv advises the Commission to consider that there are commercial callers who are more concerned to know that a number is disconnected than that the number is reassigned. This allows them to be both efficient with regards to costs while also staying in compliance with robocalling regulation.

The NPRM asks whether data from all types of voice service providers, including wireless, wireline, interconnected VoIP, and non-interconnected VoIP providers, is necessary in order for the database to be comprehensive and effective? iconectiv believes in order for commercial callers to have confidence in a reassigned numbers database, the database must be both authoritative and comprehensive. To that end, can a database be considered comprehensive if it only supports a subset of service types from a subset of service providers? What if the TN is assigned to a non-voice service such as message only devices or messaging is provided to the subscriber by a different service provider or an over the top provider? Messaging a reassigned/disconnected TN would potentially incur a cost not only to the caller but also the callee (i.e., subscribers on pre-paid plans) that receives the message. Enterprises that utilize Application to Person (A2P) messaging would also be impacted by misdirected messages due to reassigned/disconnected numbers. The Commission has rightly strived to be technology agnostic with regards to regulation related to consumer protection and the commercial calling and messaging domain is undergoing ongoing innovation. Therefore a reassigned/disconnected number database should include any providers who provide commercial callers with a means to reach consumers where they continue to rely on the telephone number.

## CONCLUSION

Should the FCC proceed to establish a reassigned number database, iconectiv recommends that it be referred to the NANC. The NANC is a longstanding well-respected advisory committee comprised of the broad spectrum of stakeholders – wireline, wireless, VoIP, interexchange, state public utility commission, state consumer protection, cable telephony and trade associations – that are well positioned to evaluate technical, operational, and financial considerations necessary for any of the proposed approaches to database administration of a reassigned number database.

Respectfully submitted,



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Dated: June 7, 2018

